

CLIFFORD
CHANCE

CLIFFORD CHANCE US LLP

31 WEST 52ND STREET
NEW YORK, NY 10019-6131

TEL +1 212 878 8000

FAX +1 212 878 8375

www.cliffordchance.com

MEMO ENDORSED

BY ECF

Direct Dial: +1 212 878 8205

E-mail: jeff.butler@cliffordchance.com

The Honorable Louis L. Stanton
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

April 8, 2022

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited et al.*,
20 Civ. 9713 (LLS)

Your Honor:

On behalf of Defendant AMCK Aviation Holdings Ireland Limited ("AMCK"), we are writing to request a 14-day extension of the fact discovery cutoff, from April 15 to April 29, 2022. The parties have been working cooperatively to arrange depositions, and the additional time is needed to schedule the depositions for two remaining AMCK witnesses, Gerald Ma and Francis Lee. The requested extension would be solely for the purpose of scheduling those two depositions.

Plaintiff Frontier Airlines, Inc. has consented to this request. This is the second request to extend the fact discovery cutoff. The parties previously made a joint request to extend the deadline from March 25 to April 15, 2022, which the Court granted by Order dated March 3, 2022. The proposed extension in this letter will not affect any other deadlines or proceedings scheduled by the Court.

Respectfully submitted,

/s/ Jeff E. Butler

Jeff E. Butler

